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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF OPPOSITION TO
PLAINTIFFS' MOTION FOR LEAVE
TO AMEND COMPLAINT**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion to Seal portions of Exhibits 1, 5, and 9 of the Broome Declaration in
8 Support of Google’s Opposition to Plaintiffs’ Motion for Leave to Amend Complaint. In making
9 this request, Google has carefully considered the relevant legal standard and policy considerations
10 outlined in Civil Local Rule 79-5. Google makes this request with the good faith belief that the
11 information sought to be sealed consists of Google’s confidential and proprietary information and
12 that public disclosure could cause competitive harm.

13 3. The aforementioned all comprise confidential and proprietary information as the
14 materials involve highly sensitive features of Google’s internal systems and operations that Google
15 does not share publicly and maintains as confidential in the ordinary course of its business and is
16 not generally known to the public or Google’s competitors. Specifically, this information provides
17 details related to Google’s internal projects, features, and logs and proprietary functionalities, as
18 well as internal metrics and investigations. Such information reveals Google’s internal strategies,
19 system designs, and business practices for operating and maintaining many of its important services
20 while complying with legal and privacy obligations.

21 4. Public disclosure of the above-listed information would harm Google’s competitive
22 standing it has earned through years of innovation and careful deliberation, by revealing sensitive
23 aspects of Google’s proprietary systems, strategies, and designs to Google’s competitors, allowing
24 them to alter their own plans for product development and/or commercialization, time strategic
25 litigation, focus their patent prosecution strategies, or otherwise unfairly compete with Google.

26 5. For these reasons, Google respectfully requests that Exhibits 1, 5, and 9 of the
27 Broome Declaration be filed under seal.
28

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in San Francisco, California on February 25, 2022.

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4 DATED: February 25, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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6
7 By /s/ Jonathan Tse

Jonathan Tse

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9 *Attorney for Defendant*
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